

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First Named	
Inventor :	Judy M. Gehman et al.
Appln. No.:	10/816,213
Filed :	April 1, 2004
For :	SYSTEM AND METHOD FOR IMPLEMENTING MULTIPLE INSTANTIATED CONFIGURABLE PERIPHERALS IN A CIRCUIT DESIGN
Docket No.:	03-1002/L13.12-0246
	Group Art Unit: 2191
	Examiner: Satish Rampuria

REQUEST FOR PRE-APPEAL REVIEW

ELECTRONICALLY FILED DECEMBER 4, 2008

Sir:

Applicants request a Pre-Appeal Brief Review of the rejections of claims 1-20, which are based on clear error of fact and omission of essential elements to establish a prima facie rejection.

I. BASIC MISUNDERSTANDING/MISDESCRIPTION IN OFFICE ACTION

The claim rejections and various comments provided by the Examiner reflect a basic misunderstanding or misdescription of expressly-recited claim elements.

The analysis provided in the Office Action fails to consider, within the context of the other claim elements, that:

- multiple instances of the same peripheral device are instantiated in a single chip design;
- at least two of the instances within the same chip have different configurations from one another; and
- the different configurations are selected at compile time without modification of the hardware description of the peripheral device.

As a result, the Office Action attempts to combine references that fail to meet the plain language of Applicant's claims.

A. **Bowen**

Bowen discloses taking C code and partitioning it into hardware and software components to make a solution. Paragraph [0011] discloses duplicating a function, wherein the same function is used multiple times (no differences in configuration). For example an ASIC/IC will use a NAND gate multiple times in a design.

Page 3 of the Office Action states that features of Applicant's arguments, "RTL is coded in a way so that different configurations can be used in a single chip without modifying the RTL for each instance," are not in the claims. But this statement is merely an example application of claim 1 to an RTL type of a hardware description language.

In general, Applicant does not follow why the Examiner refers to Bowen paragraphs 0041, 009, 0036, 0138. They have some of the same terms like compile and configuration, but different things are going on.

More specifically, the Office Action incorrectly suggests that Bowen discloses "configuring a function block to instantiate multiple instances of the peripheral device within the single chip, . . . the hardware description having options associated with different configurations of the peripheral device . . . wherein the options are selected without modification to the hardware description. . . ."

1. Options are Not Selectable Without Modification To The Hardware Description

Bowen, states in [0036], "a hardware compiler for producing from those parts of the specification partitioned to hardware a register transfer level description for configuring configurable logic resources."

The register transfer level description configures the configurable logic resources according to the input provided to the hardware compiler. The input provided to the hardware compiler contains a pre-defined configuration that is used for configuring the configurable logic resources, such as during synthesis at step 214 in Figure 2. The input itself is not configurable at compile time. Rather it is predetermined by the C code. Thus, a configuration change would require a change to the hardware description.

The Examiner may be suggesting that the C-like input is equivalent to the claimed "hardware description". However, Bowen discloses creation of multiple RTL descriptions from

the C-like input (it is reusable), whereas, claim 1 allows creation of multiple configurations ("uses") from the same hardware description (e.g., RTL).

The Examiner refers to Bowen, paragraphs [0040-0041]. Paragraph [0040] talks about taking a behavioral description of the target electronic system and automatically partitioning the required functionality between hardware and software while being able to vary the parameters (size or power) of the hardware and/or software. Varying the parameters of the hardware or software effects the output (the desired netlist or register transfer level (RTL) description). That netlist or register transfer level description (with only a single configuration) is then used in their FPGA or ASIC [0042]. There is no teaching or suggestion of any further modifications to achieve multiple configurations of that netlist or register transfer level description in the same FPGA or ASIC.

Bowen Figure 2 shows a C-like input description producing an output "RTL description" (box 212). The "width adjustment" blocks [206] are before block 212 in the flow and therefore before the RTL description is created. This RTL description is then targeted to an FPGA/ASIC [0144, 0145]. Paragraph [0127] talks about estimating the speed of the hardware.

Thus, it is incorrect to state that Bowen does disclose options selected at compile time "without modification to the hardware description".

Further, the discussion of Figure 2 does not disclose using this RTL description multiple times in the same chip (FPGA/ASIC). Whereas, the present application discusses applying configuration options to the RTL description to have the same RTL description used multiple times on the same chip, where at least two instances have different configurations.

2. Bowen Does Not Disclose Selecting Between the Options at Compile Time for Each Instantiation of the Peripheral Device

The Office Action acknowledges that Bowen does not disclose "selecting between the options at compile time for each instance of the peripheral device such that at least two of the instances have different configurations from one another," as recited in claim 1.

B. Duboc

Duboc et al. generally discloses a way to take existing building blocks and user input to make RTL, reduce to gates, and make an integrated circuit. Duboc et al. does not disclose using the same building block more than once with different input from the user in the same IC. Duboc mentions reusable templates, but where in Duboc does it say the same template is used multiple times with different inputs (configurations) in the same DSP?

1. Duboc et al. Fails to Disclose That Two Different Instantiations Can Have Two Different Configurations Selectable at Compile Time

The Examiner refers to col. 5, line 54 to col. 6 line 2, but this paragraph does not say two custom DSPs (or customizable circuit blocks with different configurations) are produced in the same IC. Duboc simply discloses that a custom DSP is produced (meaning one configuration).

Col. 3, lines 7-15 do not say that different configurations are used in the same DSP integrated circuit that is produced.

The Office Action incorrectly states Duboc et al. shows “selecting between the options at compile time for each instance of the peripheral device such that at least two of the instances have different configurations from one another,” citing Duboc, col. 8, lines 33-39; col. 10, lines 31-34.

Column 8, lines 33-39 mentions using the GUI input to initiate generation of the IC design via selection of a “compile option” from the GUI window, resulting in the execution of a script engine that verifies parameters input by a user.

In Duboc et al., the user configures the IC once. In the example described in column 6, lines 47-57, they are making one custom DSP IC. Looking at the options of Table 1, the user picks one Data Y ROM size to make this one custom DSP IC. The user does not run the GUI (or a template) twice to have two or more custom DSP configurations (different DSP instances on one IC). Rather, the user runs through the GUI once and it configures the IC.

For example, there is not an instance identifier in FIG. 6 (so as to independently configure different instances in different ways). The Y RAM and X RAM are not two different of the same RAM instances, but are tied together with the same configuration (their address space is divided).

“The Y data space, which is configurable by the user, can occupy the top 2, 4, 8 or 16K of the data space, with the remaining data addresses mapped to the X data space.” (Col. 6, lines 47-57; see also, col. 9, lines 43-47). They are not separately configurable instances of the same peripheral device.

In the present application, the same building block (peripheral) can be used twice in the same IC and have a different configuration. So, for example, the user could configure the Data Y ROM to be 2K in one custom DSP instance on the IC and the Data Y ROM to be 4K in another/different custom DSP instance on the same IC.

Duboc et al. do not disclose that two different instances of the same peripheral device can have two different configurations selectable at compile time.

In fact, Duboc et al. do not suggest that such a feature would be desirable or how such a feature could be accomplished. The disclosed GUI does not provide that structure or functionality.

C. Yu

Col. 3 line 18-35 refers to the use of flow straps, slot straps and pad straps in relation to power distribution and not in relation to a logic or functional change in the ASIC design. Whereas, Applicant’s use is for a logic or functional change/selection in the RTL (in the ASIC) (selecting option at compile time by “tying strap pins to power or ground” in claim 4).

An example would be selecting between little endian data format and big endian data format for a data bus.

Accordingly, Applicants respectfully request that the claim rejections under §103 be withdrawn.

Respectfully submitted,

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